

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re Flint Water Cases

Case No. 5:16-cv-10444-JEL-EAS

Hon. Judith E. Levy
Magistrate Judge Elizabeth A. Stafford

**DECLARATION OF KATHERINE PEASLEE
IN SUPPORT OF CLASS PLAINTIFFS' OMNIBUS RESPONSE TO
DEFENDANTS' MOTIONS TO EXCLUDE TESTIMONY OF
PLAINTIFFS' EXPERTS**

I, Katherine Peaslee, make this declaration pursuant to 28 U.S.C. § 1746. I hereby declare under penalty of perjury that the following is true and correct:

1. I am an attorney at Susman Godfrey, LLP, and I represent Class Plaintiffs in this matter. I have personal knowledge of the matters set forth below.

2. Attached as **Exhibit 1** is a true and correct copy of the current Proposed Amendment to Federal Rule of Evidence 702, along with the accompanying Committee Note. A full copy of the materials submitted by the Committee on Rules and Practices and Procedure to the Clerk of the Supreme Court of the United States is available at https://www.uscourts.gov/sites/default/files/2022_scotus_package_0.pdf (last visited June 30, 2023).

3. Attached as **Exhibit 2** is a true and correct copy of excerpts of the expert report of Martin Peterson, Ph.D, dated February 2, 2023.

4. Attached as **Exhibit 3** is a true and correct copy of excerpts of the deposition transcript for Paolo Gardoni, Ph.D, dated November 18, 2020, with highlighting added.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts of the deposition transcript for Depin (Theping) Chen, dated November 25, 2019, with highlighting added.

6. Attached as **Exhibit 5** is a true and correct copy of an excerpt of Defendants LAN and LAD's Second Supplemental and Amended Answers to Class Plaintiffs' Interrogatories, consisting of LAN and LAD's Response to Interrogatory No. 2, dated April 13, 2020.

7. Attached as **Exhibit 6** is a true and correct copy of an excerpt of the Copper Tube Handbook published by the Copper Development Association Inc., copyright 2020, containing Table 14.2c. Dimensions and Physical Characteristics of Copper Tube: Type M. The full publication from which this excerpt was taken is available online at https://copper.org/publications/pub_list/pdf/copper_tube_handbook.pdf (last visited June 30, 2023).

8. Attached as **Exhibit 7** is a true and correct copy of an excerpt of the Rebuttal Declaration of Clifford P. Weisel, M.S., Ph.D, dated March 3, 2023.

9. Attached as **Exhibit 8** is a true and correct copy of excerpts of the deposition transcript for Michael R. Schock, dated May 5, 2020 and May 6, 2020, with highlighting added.

10. Attached as **Exhibit 9** is a true and correct copy of an excerpt of the deposition of Marc Edwards, Ph.D, dated August 10, 2020, with highlighting added.

11. Attached as **Exhibit 10** is a true and correct copy of excerpts of the deposition of Panagiotis Georgopoulos, M.S., Ph.D., dated May 23, 2023, with highlighting added.

12. Attached as **Exhibit 11** is a true and correct copy of an excerpt of the Rebuttal Report of Dr. Larry L. Russell: Veolia, dated March 3, 2023.

13. Attached as **Exhibit 12** is a true and correct copy of excerpts of the Expert Report of William A. Huber, PhD, PSTAT, dated February 3, 2023.

14. Attached as **Exhibit 13** is a true and correct copy of the article Brooks SK and Patel SS (2022) Psychological consequences of the flint water crisis: a scoping review. *Disaster Med. Public Health Prep.* 16:1259–1269.

15. Attached as **Exhibit 14** is a true and correct copy of David Keiser's Response to Professor Christian Redfearn's Supplemental Expert Report, dated March 3, 2023, with highlighting added.

16. Attached as **Exhibit 15** is a true and correct copy of an excerpt of the deposition transcript for Christian Redfearn, Ph.D., dated April 24, 2023, with highlighting added.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed: Seattle, Washington
June 30, 2023

/s/ Katherine Peaslee

Katherine Peaslee